UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

DAVID KRAMER, Individually, and as the)
President and Sole Owner of CERTIFIED)
CAR SALES, LLC., a Missouri Limited)
Liability Company,)
Plaintiff,)
· v.) Case No. 08 CV 2530
SHERIFF'S DEPUTY STEVEN STELTER;) Judge Castillo
Individually and as a Deputy of the) Magistrate Judge Keys
DuPage County Sheriff's Office; JOHN P.)
CREEDON, Individually and as Director)
Of the Tri-County Auto Theft Unit;)
MICHAEL J. COLANDO, deceased,)
Individually and as a member of PUGI)
KIA, LLC and as the President and sole)
Owner of D & M AUTO SALES, INC.;)
DOMINIC L. PUGLIANI, Individually,)
and as a member of PUGI KIA, LLC;)
LARRY M. HALL, Individually and as a)
Manager of PUGI KIA, LLC; ANTHONY) ·
J. COLANDO, Jr., Individually and as a)
Manager of PUGI KIA, LLC; ANTHONY)
J. COLANDO, Sr., not individually but as)
named executor in his capacity as executor)
of the estate of MICHAEL J. COLANDO,)
deceased; DOMINIC MANCINI,)
Individually and as an attorney; PUGI KIA,)
LLC; D & M AUTO SALES, INC.; KIA)
MOTORS AMERICA, INC.;)
VW CREDIT, INC.,)
Defendants.)

NOTICE OF MOTION

TO: Stephen M. Komie
KOMIE AND ASSOCIATES
One North LaSalle Street, Suite 4200
Chicago, Illinois 60602

PLEASE TAKE NOTICE that on the 4th day of June, 2008, at 9:45 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Ruben Castillo or whomever may be sitting in his stead, in Room 2141 in the U.S. District Court for the Northern District of Illinois, Eastern Division, 219 South Dearborn, Chicago, Illinois 60604, and shall then and there present the attached:

DEFENDANTS LARRY HALL, DOMINIC MANCINI AND PUGI KIA, LLC'S MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD

A copy of which is hereby served upon you.

s/ Paul E. Kelly
One of the Attorneys for Defendants
LARRY HALL, DOMINIC MANCINI and
PUGI KIA, LLC

Paul E. Kelly, ARDC No. 1437356 David L. King, ARDC No. 3128899 M. Kellett McConville, ARDC No. 6290167 KELLY & KING, P.C. 20 North Clark Street, Suite 2900 Chicago, Illinois 60602 312-553-5290 (Fax) 312-553-5291

PROOF OF SERVICE

I, Paul E. Kelly, attorney for Defendants Larry Hall, Dominic Mancini and Pugi Kia, LLC, certify that I have served a copy of the foregoing **NOTICE OF MOTION** to:

> Stephen M. Komie KOMIE AND ASSOCIATES One North LaSalle Street, Suite 4200 Chicago, Illinois 60602

electronically on May 23, 2008 at or before 5:00 p.m.

s/ Paul E. Kelly One of the Attorneys for Defendants LARRY HALL, DOMINIC MANCINI and PUGI KIA, LLC

Paul E. Kelly, ARDC No. 1437356 David L. King, ARDC No. 3128899 M. Kellett McConville, ARDC No. 6290167 KELLY & KING, P.C. 20 North Clark Street, Suite 2900 Chicago, Illinois 60602 312-553-5290 (Fax) 312-553-5291